

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.) Cause No. 4:14-CR-00311-CEJ (DDN)
)
CHRISTOPHER M. CRISTEA,)
)
Defendant.)

MOTION FOR TEMPORARY RELEASE FROM DETENTION

COMES NOW, Defendant Christopher Cristea, by and through counsel, and hereby moves the Court for temporary release from detention. In support of said motion, Defendant states as follows:

1. Pursuant to the Court's order, the Defendant is currently being detained pending the trial in this matter.
2. Defendant is currently being housed in the Lincoln County Justice Center in Troy, Missouri.
3. Defendant's oldest son is graduating from high school on **Sunday, May 24, 2015, at 3:00 p.m.** The ceremony will take place at that time at Lutheran High School Gymnasium, 5100 Mexico Road, St. Peters, Missouri.
4. Defendant proposes that his wife, Christina Cristea pick him up for the ceremony at **noon on Sunday, May 24, 2015**, and return him directly to the Lincoln County Jail **by 7:00 p.m. on that same date.**
5. In light of the above, the undersigned respectfully requests that he be temporarily released from custody along the lines proposed by Defendant.

6. The undersigned attempted to contact the Government's attorney, Steven Muchnick, about the instant motion. However, the undersigned was not able to obtain the Government's position regarding the instant motion prior to the filing.

WHEREFORE, Defendant respectfully prays that the Court grant the requested relief, and for such other and further relief that the Court deems just and proper.

Dated: May 22, 2015.

Respectfully submitted,

ROSENBLUM, SCHWARTZ, ROGERS &
GLASS, PC

By: /s/N. Scott Rosenblum
N. SCOTT ROSENBLUM, #33390MO
120 S. Central Avenue, Suite 130
St. Louis, MO 63105
Telephone: (314) 862-4332
Facsimile: (314) 862-8050
E-mail: srosenblum@rsrglaw.com

Attorney for Defendant, Christopher Cristea

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.) Cause No. 4:14-CR-00311-CEJ (DDN)
)
)
CHRISTOPHER M. CRISTEA,)
)
Defendant.)

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of May, 2015, an electronic copy of the above document was filed with the Clerk of Court using the CM/ECF system, and that a copy of said document was distributed to all counsel of record via the CM/ECF system.

ROSENBLUM, SCHWARTZ, ROGERS &
GLASS, PC

By: /s/N. Scott Rosenblum
N. SCOTT ROSENBLUM, #33390MO
120 S. Central Avenue, Suite 130
St. Louis, MO 63105
Telephone: (314) 862-4332
Facsimile: (314) 862-8050
E-mail: srosenblum@rsrglaw.com

Attorney for Defendant, Christopher Cristea